

The Honorable Brian D. Lynch  
Hearing Date: November 1, 2017  
Hearing Time: 9:00 a.m.  
Response Date: October 25, 2017  
Chapter 7  
Location: Tacoma

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re:

DICKSON MANG JR.,

Debtor.

No. 15-40334

MOTION TO APPROVE SALE OF  
PROPERTY FREE AND CLEAR OF LIENS  
PURSUANT TO 11 U.S.C. § 363 (f)

COMES NOW the Trustee, Kathryn A. Ellis, by and through the undersigned attorney, and moves the Court for an order permitting sale of the real property located at 5419 Courtney St SE, Olympia, WA, free and clear of all liens, pursuant to 11 U.S.C. § 363 (f), for the sum of at least \$267,000.00, or such sum as may be negotiated or adjusted to accomplish a sale, to Diep Huynh, and/or assigns, or to the individual(s) making the highest and best offer to the estate at or before the hearing on this motion.

The Trustee also seeks authority to pay the first position Deed of Trust of Wells Fargo Bank NA, and/or assigns, in the amount of at least \$238,770.00, or such sum as may be negotiated or adjusted to accomplish a sale, in full satisfaction of its lien against this property after payment of all costs of closing, including real estate commissions, property taxes, excise taxes, statutory utility liens, statutory HOA liens, and other closing costs, together with a buyer's premium to the estate in the amount of \$15,000.

Said sale to Diep Huynh, and/or assigns, will be free and clear of all liens and interests, said liens and interests to attach to the proceeds of the sale as though those proceeds were the

**MOTION TO APPROVE SALE OF PROPERTY FREE  
AND CLEAR OF LIENS PURSUANT TO 11 U.S.C. § 363 (f) - 1**

KATHRYN A. ELLIS, ESQ.  
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Suite 207  
Seattle, WA 98108  
(206) 682-5002

1 property. Notwithstanding the foregoing, the Trustee requests the authority to pay the above  
2 named secured creditor in the approximate amount stated.

3 DATED this 9<sup>th</sup> day of October, 2017.  
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5 /s/ Kathryn A. Ellis

6 Kathryn A. Ellis, WSBA #14333

7 Attorney for Trustee

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